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October 14, 2021

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Erdolo Eromo, 15 Cr 616 (AT)*
Travel Privileges under the terms of Pretrial Release

Your Honor:

I write to respectfully request that the bond conditions for my client, Erdolo Eromo, be modified to permit domestic travel throughout the United States. Currently, his travel is restricted to the the following geographical areas: the Southern, Eastern and Northern Districts of New York, the District of Massachusetts, and the Central District of California.

This request is unopposed. I have communicated the nature and particulars of this request to (1) Adriana Coronado-Buergo at the United States Pretrial Services Office in the Central District of California (where Mr. Eromo lives), and (2) Assistant United States Attorney Jilan Kamal. Neither has an objection to the instant request.

Background

The Bail Conditions for Mr. Eromo issued on October 1, 2015 (Dkt. No. 68) are, in pertinent part, as follows:

1. A \$500,000 personal recognizance bond, co-signed by one financially responsible person and secured by property with equity value of at least \$500,000;
2. Mr. Eromo's travel is restricted to the Southern, Eastern and Northern Districts of New York, the District of Massachusetts and the Central District of California; and
3. Mr. Eromo must surrender travel documents to Pretrial Services.

Basis for the Instant Application

Mr. Eromo is currently the Chief Operating Officer of Concierge Healthcare Partners, a small business run by his brother, Ersno Eromo, MD. The business is beginning to grow and expand, and as a

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consequence, Mr. Eromo needs to travel to trade shows and to meetings with current and potential partners. Accordingly, Mr. Eromo seeks an enlargement of his travel privileges to include any domestic travel within the United States.

For the Court's information, Mr. Eromo pled guilty in this matter on June 28, 2016, before the Honorable Katherine B. Forrest, who was previously assigned to this matter. Thereafter, Mr. Erdolo testified in the government's case in chief in three separate trials of his co-defendants, also before Judge Forrest.

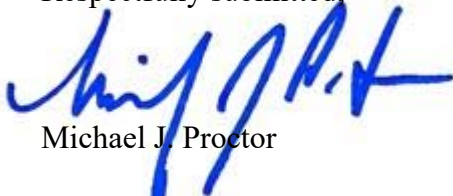
At all times during this case, Mr. Eromo has been in full compliance with the terms of his pretrial release and is in good standing with Pretrial Services—for over six years. Also, Mr. Eromo has, on four previous occasions, received Court permission to travel outside of his restricted areas and has, in each instance, complied with the conditions of his travel and has traveled and returned without incident.

Conclusion

For the reasons set forth herein, we respectfully request that Mr. Eromo's bond terms be modified to permit domestic travel throughout the United States.

Mr. Eromo appreciates the Court's attention.

Respectfully submitted,



Michael J. Proctor

cc: Juan Kamal, Assistant United States Attorney (by ECF)
Andriana Corona-Buergo, U.S. Pretrial Services Officer (by email)